

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Verizon Massachusetts – Pricing of
Unbundled Network Elements and
Resale Services Discounts

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D.T.E. 01-20

**MOTION OF VERIZON MASSACHUSETTS
FOR EXTENSION OF COMPLIANCE FILING DATE
AND TIME FOR FILING PETITIONS FOR RECONSIDERATION**

INTRODUCTION

On July 11, 2002, the Department issued its Order in this proceeding on costs for unbundled network elements (“UNE”). This Order requires Verizon Massachusetts (“Verizon MA”) to submit, within 25 days of the Order, a compliance filing using the input values approved by the Department. In addition, under the Department’s rules, the parties have 20 days from the date of the Order to submit petitions for reconsideration. 220 C.M.R. 1.11(10). For the reasons discussed below, Verizon MA respectfully requests that the Department extend, by 35 days, the August 5, 2002 date for Verizon MA’s submission of compliance cost studies and that the Department extend, by two weeks, the date for any petitions for reconsideration of the Department’s July 11 Order.

ARGUMENT

Verizon MA cannot meet the compliance filing deadline established by the Department. As Mr. Curbelo, Executive Director within the Verizon Service Costs organization, explains in the attached Affidavit, preparing this compliance filing is an enormous task, and Verizon MA

needs additional time to prepare this filing to ensure that it is accurate and complete. Verizon MA must revise all of its over 50 recurring cost studies, comprising over 225 rate elements, and its more than 130 nonrecurring cost studies, a lengthy and complex process that requires careful coordination between groups within the Verizon Service Cost organization and time-consuming analyses of the revised inputs, studies, investment levels, and annual cost factors. In its Order, the Department specified numerous revised inputs and general guidelines for individual cost studies, many of which will require Verizon MA to perform substantial new analysis and development of data.

In a few cases, such as collocation power, Verizon MA was ordered to create and submit an entirely new study. In many others, Verizon MA must perform laborious and time-intensive revisions; for example, in its switching cost studies, information for each of Verizon MA's wire centers must be manually entered. Furthermore, Verizon MA has to develop a new forward-looking to current conversion ("FLC") factor, which in turn will require revising all of Verizon MA's other annual cost factors. Verizon MA was also ordered to restructure its tariff in significant ways, which will require substantial work that can only be done after the cost studies and annual cost factors are revised and finalized.

Verizon MA also proposes to extend the deadline for any petitions for reconsideration of the Department's Order by two weeks. First, until Verizon MA fully reviews the Department's Order and begins to assess the impact on UNE rates, Verizon MA is not in a position to determine which issues (if any) to ask the Department to reconsider. Second, because, unlike the other parties, Verizon MA must commit substantial resources to revising the cost studies, developing new rates, and revising its tariffs. Accordingly, it would be exceedingly difficult for

Verizon MA to prepare any petition for reconsideration at the same time it is preparing its compliance filing.

CONCLUSION

For the foregoing reasons, Verizon MA requests that the Department grant this motion to extend the deadline for Verizon MA's compliance filing by 35 days (to September 9, 2002) and any petitions for reconsideration by 14 days (to August 14, 2002).

Respectfully submitted,

VERIZON MASSACHUSETTS

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